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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHAWN E. O'LEARY,

Plaintiff

v.

CAROLYN W. COLVIN, Acting
Commissioner of Social Security,

Defendant.

) Case No: 2:16-cv-00865-GMN-CWH

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**JOINT STIPULATION FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
CROSS-MOTION TO AFFIRM**

(First Request)

1 Plaintiff Shawn E. O'Leary (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days
4 from October 3, 2016 to November 2, 2016. This is the Commissioner's first request for an
5 extension.

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18 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or Remand
19 (Plaintiff's Motion), counsel has been handling a large number of District Court and Ninth Circuit
20 cases in addition to this one, with seven briefs due within the next twenty-four days. Additionally,
21 the Commissioner's counsel has had numerous other deadlines, including a District Court brief
22 filed September 30, 2016, five other District Court briefs filed, as well as several end-of-fiscal year
23 training courses, a number of conferences in an employment case, a settlement agreement, and
24 multiple mentoring and reviewing duties in the Office of the General Counsel. Counsel was also
25 out of the office for approximately two days. As result, the Commissioner needs additional time
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1 to respond properly to the issues Plaintiff raised in her Motion. Plaintiff has no objection.

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3 Respectfully submitted,

4 Date: October 3, 2016

GERALD M. WELT
Attorney at Law

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6 By: /s/* Cyrus Safa
CYRUS SAFA
*by email authorization on 10/3/16

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8 Attorneys for Plaintiff

9 Date: October 3, 2016

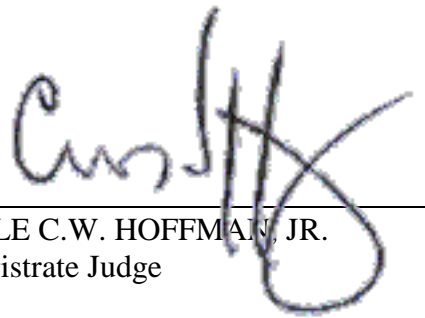
DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

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12 By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

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14 Attorneys for Defendant

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19 IT IS SO ORDERED.

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22 DATE: October 4, 2016


23 THE HONORABLE C.W. HOFFMAN, JR.
24 United States Magistrate Judge
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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

CYRUS SAFA
Attorney at Law
rohlfing.office@rohlfinglaw.com

Respectfully submitted,

Date: October 3, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant